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Let nature do more of your processing.
Select grains and oilseeds by variety for market advantage.

Saturday, August 13, 2005

Fax: (202) 205-7808

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW. Room 4008
So., Ag Stop 0268
Washington, DC 20250

Dear Mr. Neal and National Organic Standards Board:

This letter refers to the National Organic Program, Sunset Review, Docket number TM-04-07.
Clarkson Grain Co., Inc. supports the removal from the National List of the following substance(s):

Name of Substance	Location on National List	Reason for removal from National List	Supporting Documents
Lecithin (unbleached)	205.606	Certified 100% organic lecithin is available in substantial commercial quantities with currently surplus production capacity that can be quickly expanded.	Clarkson Soy Products, LLC has been producing 100% organic lecithin for over two years in commercial quantities. Its functionality and specifications are identical to that of similarly formulated conventionally produced lecithin. This product goes into the world's first 100% organic baby food in Korea, into new soy food production techniques in Japan and into power bars, tortillas, baked items and supplements in North America. It is an organic agricultural product that was not available when the National List was first drafted. It became commercially available in 2003.

Sincerely,

Lynn Clarkson

Lynn Clarkson Grain
President, Clarkson Grain Co., Inc.

Cc: Organic Trade Association



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- * **Let NATURE do more of your processing of foods and feeds.**
 - * **Select grains and oilseeds by variety for market advantage.**
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Date: August 15, 2005

To: Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave. SW
Room 4008 So., Ag Stop 0268
Washington, DC 20250

From: Rick Buckner, Ph.D., General Manager, Clarkson Grain, Co.

Subject: **Reclassification of Yeast as an “Agricultural Product”**

I support the July 30, 2004 request by Marroquin International Organic Commodities Services to reclassify yeast as an “agricultural product” from its current classification as a “nonagricultural substance”. This change is requested to allow organic yeast to become an organic ingredient.

I further support the rationale submitted on August 1, 2005 by Nick Bloomquist of Spectrum Organic Products Inc. Both yeast and mushrooms are natural, living organisms classified in the fungi kingdom. Both can be grown on natural, organic agricultural materials. Since they can be grown under conditions where they obtain their nutrients from natural, agricultural materials, they should be considered organic when grown and harvested under these conditions. The actual method of reproduction is immaterial in determining whether or not yeast is organic or not.

Similar to organic mushrooms, certified organic yeast grown under organic conditions are available today. Since the NOP policy requires the maximum use of organic ingredients and since organic yeast is available today, I request that the NOSB support and reclassify yeast as an “agricultural product” which would require organic food processors to use organic yeast.

Sincerely yours,

Rick Buckner, Ph.D.
Executive VP/General Manager